

December 21, 2015

VIA ELECTRONIC MAIL

Ms. Amber Whisnant
Environmental Scientist
U.S. Environmental Protection Agency
Chemical Risk Information Branch
Air & Waste Management Division
11201 Renner Boulevard
Lenexa, KS 66219

Re: Confidential Business Information related to CRNF Plant RMP Inspection, December 7-11, 2015

Dear Ms. Whisnant,

CRNF has reviewed the large quantity of documents provided during the inspection to ensure identification of only those documents that are required to be handled as Confidential Business Information (CBI) in your records. Thank you for your patience to completed the review and accepting the substantiation.

Specific page numbers of each document that should be handled as CBI are included in the list below. CRNF is releasing its claim of CBI on all other documents that were providing during the inspection.

Document Number		pages
001		37-55
003a		2 - 30
0014b		9-45
0014c		2 - 8
0014d		2 - 8
0014e		2 - 3
0016		4, 30, 31
0017a		2 - 78
0017b		2,4,6,8,10,12
0018a		2-23
0019a		3
0019b		2 - 120
0019c		2 -33
0019d		2-86

0019e		2-13
0019f		2-41
0019g		2-18
0019h		2-6
0019i		2-18
0019j		2-9
0019k		2-21
0020a		2-9
0020b		2-8
0021a		52-83
0022		2 - 14
0024a		2 - 54
0024b		2 - 81
0028		2
0030a		2 - 15
0035		2 - 3
0038		all photos

Answers to the nine questions required for substantiation follow.

1. For the above referenced documents, the information is permanently maintained as confidential.
2. The information is related to the technology, design, operation and maintenance of the facility. It is confidential business information because the facility is one of a kind and important to restrict from potential competitors. Release of the information could result in harm to the competitive position of CRNF.
3. The information has not been disclosed to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information. CRNF requires that no information be released outside of CRNF and has agreements of confidentiality with contractors to protect this information.
4. The information is not publically available on the Internet, publicly available databases, promotional publications, annual reports, or articles. The public has not means by which to access this information. CRNF would not customarily release this information to the public.
5. To my knowledge, no governmental body has made a determination as to the confidentiality of the information.
6. The competitive position of CRNF could be likely harmed by release of this information because the technology and design could be duplicated. Operation and maintenance practices and procedures could be used to aid competitors in efficiency and production, thus reducing the competitive advantage of CRNF.
7. The information provided was during the on-site inspection and was mandatory.
8. No information provided is subject to a trade secret.
9. None of the information provided is emission data, information collected under section 211(b)(2)(A) of the Clean Air Act, effluent data, a standard or limitation, or information dealing with the existence, absence, or level of contaminants in drinking water. The

information is, as noted in response 2, related to the technology, design, operation and maintenance of the facility.

Thank you for the opportunity to provide the substantiation of CBI.

Sincerely,

A handwritten signature in dark ink, appearing to read "Neal E. Barkley", is positioned above the printed name.

Neal E. Barkley, P.E.
Vice President & Fertilizer Facility Manager